

Exhibit 44

Hunters Capital, LLC v. City of Seattle

30(b)(6) Thomas Mahaffey

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UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE		DEPOSITION OF THOMAS MAHAFFEY EXAMINATION INDEX	
HUNTERS CAPITAL, LLC, et al.,) Plaintiff,) vs.) No. 20-cv-00983-TSZ CITY OF SEATTLE,) Defendant.)		EXAMINATION BY: PAGE 30(b)(6) Examination by Mr. Weaver 6 Non-30(b)(6) Examination by Mr. Weaver 73	
VIDEOTAPED VIDEOCONFERENCE 30(b)(6) DEPOSITION UPON ORAL EXAMINATION OF CITY OF SEATTLE (THOMAS MAHAFFEY)		EXHIBIT INDEX EXHIBITS FOR IDENTIFICATION PAGE Exhibit 1 Amended Notice of Videotaped 8 Deposition Pursuant to FRCP 30(b)(6) to City of Seattle Exhibit 2 Email with attachment; 10 SEA-SPD_005983-984 Exhibit 3 June 29 Events Incident Action 25 Plan; SEA_00007766-787 Exhibit 4 June 24 Events Incident Action 32 Plan; SEA-SPD_007528-550 (CONFIDENTIAL) Exhibit 5 Email chain; SEA_00020853-858 33 Exhibit 6 Email; SEA_00022828-830 41 Exhibit 7 Seattle PD SuperForm; SEA_00156958- 45 960 Exhibit 8 Email; SEA_00000868-869 49 Exhibit 9 Printout of details related to 49 Exhibit 8 Exhibit 10 Excel spreadsheet 51 Exhibit 11 Email chain; SEA_00023588-589 58 Exhibit 12 Executive Order 2020-08; 63 SEA_00045264-268	
Seattle, Washington (All participants appeared via videoconference.) DATE TAKEN: JANUARY 26, 2022 REPORTED BY: CINDY M. KOCH, RPR, CCR #2357		Page 2	
1 APPEARANCES 2 FOR PLAINTIFF: 3 TYLER S. WEAVER 4 Calfo Eakes LLP 5 1301 Second Avenue 6 Suite 2800 7 Seattle, WA 98101-3808 8 206.407.2237 9 tylerw@calfoeakes.com 10 FOR DEFENDANT: 11 SHANE P. CRAMER 12 ARTHUR W. HARRIGAN, JR. 13 Harrigan Leyh Farmer & Thomsen LLP 14 999 Third Avenue 15 Suite 4400 16 Seattle, WA 98104 17 206.623.1700 18 shanec@harriganleyh.com 19 arthurh@harriganleyh.com 20 JOSEPH G. GROSHONG 21 Seattle City Attorney's Office 22 701 5th Avenue 23 Suite 2050 24 Seattle, WA 98104-7095 25 206.684.8200 joseph.groshong@seattle.gov 26 ALSO PRESENT: LINDSAY HITCHCOCK, videographer 27 Buell Realtime Reporting, LLC 28 * * * * *		Page 4 EXHIBIT INDEX (Continuing) EXHIBITS FOR IDENTIFICATION PAGE Exhibit 13 Email; SEA_00036004-005 119 Exhibit 14 Email, July 4 Events Incident 156 Action Plan; SEA_00007505-545 Exhibit 15 Email chain; SEA-SPD_006803-804 167 Exhibit 16 Email chain; SEA_00028176-177 170 Exhibit 17 Email containing Executive Order 184 2020-08; SEA_00019316-319 Exhibit 18 Email chain; SEA_00021402-404 185 19 20 21 22 23 24 25	

1 (Pages 1 to 4)

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<p style="text-align: right;">Page 9</p> <p>1 Q. Okay. Is there anything else you understand 2 that you've been designated for, other than those 3 topics?</p> <p>4 A. No. To the best of my understanding, those are 5 what I've been designated to talk about.</p> <p>6 MR. CRAMER: And, Tyler, let me clarify 7 something.</p> <p>8 MR. WEAVER: Go ahead.</p> <p>9 MR. CRAMER: For 36, it's Subsection iii, as 10 that relates to SPD, which I think was probably obvious 11 and what you meant. We've also designated the chief for 12 37, and specifically each of the subtopics, but 13 primarily Subsection iv.</p> <p>14 MR. WEAVER: Okay. All right.</p> <p>15 MR. CRAMER: And that's the extent of it. 16 And I think that covers the topics that you wanted to 17 pursue at this point in the litigation with the City.</p> <p>18 MR. WEAVER: Thanks, Shane. That helps.</p> <p>19 BY MR. WEAVER:</p> <p>20 Q. So I'm going to try to keep this first part, 21 just for subject of -- sake of clarity, to the 30(b)(6) 22 topics. And can you -- I -- for the purpose -- let's 23 also set this for the purposes of the deposition, just 24 so that we're clear going forward and for the -- for the 25 transcript and the record.</p>	<p style="text-align: right;">Page 11</p> <p>1 BY MR. WEAVER: 2 Q. Okay. You should have something that's coming 3 up in the ex- -- that's coming up in the chat that's 4 marked Exhibit 2. Let me know when you've got it up.</p> <p>5 A. I have it.</p> <p>6 Q. Okay. So do you recognize this document?</p> <p>7 A. Yes, I do.</p> <p>8 Q. Okay. So was this a policy that you announced 9 for the police department on June 12, 2020?</p> <p>10 A. I wouldn't have characterized it as a policy. 11 It was just some direction given to officers.</p> <p>12 Q. Okay. This was a direction you gave to 13 officers in the police department on June 12, 2020; is 14 that right?</p> <p>15 A. Yes, that's correct. That's the date it was 16 sent out.</p> <p>17 Q. Okay. Do -- was -- and was this a modification 18 of -- from -- was this different than the normal 19 operating procedures within the area of Capitol Hill?</p> <p>20 A. Yes. Based on the circumstances we were 21 facing, I felt it was necessary to give some guidance to 22 officers.</p> <p>23 Q. What do you mean by the circumstances that you 24 were facing?</p> <p>25 A. There had been significant protests for the</p>
<p style="text-align: right;">Page 10</p> <p>1 What is your understanding of the term "CHOP" 2 as it relates to this case?</p> <p>3 MR. CRAMER: Objection. Form.</p> <p>4 A. Well, it's an acronym that I understand to mean 5 Capitol Hill -- I think is it occupied protest? I think 6 then zone was often found on the end of that. That's 7 what I relate to it as.</p> <p>8 BY MR. WEAVER:</p> <p>9 Q. Let me just go down a different -- a different 10 route.</p> <p>11 So in June of 2020, you were the -- you were 12 the assistant chief in charge of the patrol operations; 13 is that correct?</p> <p>14 A. That's correct.</p> <p>15 Q. Okay. Do you recall a point at which the 16 Seattle Police Department modified its 911 response 17 procedures within an area on Capitol Hill, roughly 18 around the area of Cal Anderson Park and the East 19 Precinct?</p> <p>20 A. I guess I'd ask what you mean by "modified."</p> <p>21 MR. WEAVER: Okay. Let me pull up a 22 document so that we can get on track here. Bear with 23 me. My apologies. I'm having a bit of technical 24 difficulties here.</p> <p>25 (Exhibit No. 2 marked.)</p>	<p style="text-align: right;">Page 12</p> <p>1 week prior to this. Now we have an area that has some 2 barricades placed around it. We're no longer in our 3 precinct. We had seen, and reports of, armed people at 4 this barricade.</p> <p>5 We'd actually had a lieutenant and a sergeant 6 that were confronted by armed people early -- earlier in 7 the week as well. So based on all that was going on, 8 some guidance was required for responses in the area to 9 keep officers and the public safe.</p> <p>10 Q. So let me ask you about -- first of all, what's 11 the Edward Sector?</p> <p>12 A. That is one of our patrol sectors. Each 13 precinct is divided into sectors. Edward Sector is in 14 the East Precinct, and the area generally covers in -- 15 the neighborhood we call Capitol Hill.</p> <p>16 Q. Okay. And let me ask you, on this document -- 17 first of all, did you -- who's Jason Verhoff?</p> <p>18 A. He is a lieutenant on the Seattle Police 19 Department.</p> <p>20 Q. And had you written this out for Mr. Verhoff, 21 or had you dictated it to him to be sent out?</p> <p>22 A. I don't recall specifically. So he was part of 23 the group -- command group in our operations center. 24 And as we're recognizing, then formulating plans to deal 25 with issues that come up, that was one of his</p>

3 (Pages 9 to 12)

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1 specified -- specific? I don't who it was sent to
 2 directly.

3 MR. WEAVER: Okay. I'm going to drop
 4 another document in the chat. We're getting -- we're
 5 getting fast and furious on the -- on the documents
 6 already, so...

7 (Exhibit No. 5 marked.)

8 THE WITNESS: Okay.

9 BY MR. WEAVER:

10 Q. All right. So is this an email you sent on
 11 June 16th?

12 A. Just blow it up here a little bit.

13 Yes.

14 Q. Okay. So in the first sentence, you say, "For
 15 clarification, this is what I approved and was sent out
 16 department-wide last Friday," and then it appears to
 17 have the text of the email from Exhibit 2 down below,
 18 towards the bottom of the first page. Is -- am I
 19 understanding that correctly?

20 A. That appears correct, yes.

21 Q. Okay. So does that refresh you as to whether
 22 the Exhibit 2 was sent out to the entire department?

23 A. That's what I said in the email. But like I
 24 said, I don't -- specifically I don't recall who it was
 25 sent out to, but that's what I'm saying in this email,

1 were IAPs being sent out with the wording of "mass
 2 casualty event."

3 Does that help you remember at all when it
 4 was -- when the wording was changed to "critical life
 5 safety emergency"?

6 MR. CRAMER: Objection. Form.

7 A. It doesn't. I will say one thing, with IAPs,
 8 especially during this time, we were having -- the
 9 operations center was having to produce so many,
 10 sometimes getting the language caught up or getting
 11 things changed, because of everything else that was
 12 going on from the planning perspective, sometimes they
 13 weren't as timely as they could have been, with getting
 14 changes put into them.

15 BY MR. WEAVER:

16 Q. Was it your understanding that there was any
 17 difference in the -- in the substance of the directive
 18 between the directive that used the term "mass casualty
 19 event" and the directive that used the term "critical
 20 life safety emergency"?

21 A. Sorry; I'm not quite following your question
 22 there.

23 Q. Okay. Was the change from "mass casualty
 24 event" to life -- "critical life safety emergency" meant
 25 to convey a change in department policy or directive?

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1 yes.

2 Q. Okay. So I'd like to go back to Exhibit 4,
 3 which is the June 24th IAP. And if you could scroll
 4 down to -- I think it may be 15 of this one as well.
 5 So -- yes, it's 15. I'm sorry. It's 16. Bates
 6 No. 7543.

7 This appears to have similar language to what
 8 we've been talking about, but it uses the term "mass
 9 casualty event" rather than "critical life safety
 10 emergency."

11 Do you see that?

12 A. Yes.

13 Q. So this was June 24th of 2020. Does this
 14 refresh you at all as to when there might have been a
 15 change to the wording of "critical life safety
 16 emergency"?

17 MR. CRAMER: Objection. Form.

18 A. Sorry. You said Exhibit 4 says mass casualty
 19 event, or am I on the wrong exhibit or --

20 BY MR. WEAVER:

21 Q. I believe it does, on Page 16, if you -- you
 22 can look at it, yourself.

23 A. I'm looking at Exhibit 4, and it's -- says
 24 "mass casualty event" on Page 16.

25 Q. Okay. So it appears that on June 24th there

1 A. No. Again, I think it was just meant to
 2 clarify the wording, and really the -- the premises that
 3 we were operating under, I think it just -- and the
 4 things that we were briefed kind of every day, I think
 5 it was just providing more clarity.

6 Q. And I'd like you to go to the bottom of the
 7 last page on Exhibit 4. This again is a map showing
 8 the -- what's -- what were the boundaries of the red
 9 zone; is that right?

10 A. Correct.

11 Q. And were those the same that they had been in
 12 the directive that went out department-wide on June 12th
 13 in Exhibit 2?

14 MR. CRAMER: Objection. Asked and answered.

15 A. Yes. They -- they look the same. I don't see
 16 any significant changes in either map.

17 BY MR. WEAVER:

18 Q. Let me ask you, with regard to -- and we can
 19 go -- we can go to any -- I guess go back up to 16 on
 20 Exhibit 4, Page 16.

21 A. Okay.

22 Q. Okay. So with regard to Edward Sector, it
 23 indicates that a required -- requires a four officer
 24 minimum response to all Edward Sector calls for service
 25 outside the red zone.

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What does -- what did that mean?

A. For any response for police service, that we were going to send, again, as it indicates, a minimum of four officers to that call.

Q. So prior to June 2020, what was the minimum response for a call in the Edward Sector?

A. It would depend on the type of call, again, with -- what the actual details of the incident were. But it could be as little as one officer for a nonpriority event with no suspect on the scene, to many multiple of officers for some type of ongoing life safety emergency.

Q. So what -- what was the least number of officers for a particular call that would be a minimum required to respond to a call prior to June 2020?

A. The fewest would be one for a low priority response.

Q. Okay. And during the -- during the pendency of these directives in June of 2020, even those low priority calls would still require a four officer response? Is that correct?

A. That is correct, yes.

Q. And why was that?

A. Due to just the conditions that we hadn't faced before, based on -- I will describe it as the negative

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trying to keep the public safe by not responding to calls, how was not responding to calls keeping the public safe?

MR. CRAMER: Objection. Form.

A. That's not what I mean by that. It's, again, to -- we're responding to calls. It's just that we're doing it in a way that allows us to provide service in the best way that we can.

We're just considering the -- again, the unprecedented circumstances that we were facing at the time, and the scrutiny, and threat to officer safety that we were having to deal with.

That's what the -- really considerations that I had to -- to deal with at the time and how we were going to still provide police services while dealing with all these other issues that were swirling around us.

BY MR. WEAVER:

Q. So going back to Exhibit 5, in the second paragraph of this email you sent on June 16th, you're asking whether the -- first of all, you sent this to Carmen Best, and then who's Christopher Fisher?

A. He was the chief's -- I believe his title was strategic advisor.

Q. And you say, "Please let me know if this should be altered or clarified in anyway if it is creating a

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feelings and animosity towards Seattle police officers at that time that was particularly concentrated in that area of the city.

Officers were going to seemingly routine calls and being accosted by people seeking confrontation even in routine situations. So again, in just working through some of these unprecedented circumstances that were dealt with, again, officer safety being the most -- the thing that was most foremost on my mind during this period, we determined that this was the best course of action to take.

Q. Okay. So within the Edward Sector, but outside the red zone, were there cases in which there might be a mass casualty event or a critical life safety emergency, that it would be appropriate under your directive for officers not to respond?

MR. CRAMER: Objection. Form. Calls for speculation.

A. No. But again, depending on the criticality of the incident, I want them to formulate a thoughtful and considered response before going in, again, to ensure their safety, de-escalate, minimize the potential use of force, and keep the public safe.

BY MR. WEAVER:

Q. So when you indicate that it was -- you were

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messaging issue or confusion internally or externally." Do you see that?

A. Yes.

Q. Do you remember asking for that, for any clarification they wanted?

A. Reading this email, that -- now it's bringing up I did ask that, yes.

Q. Do you recall whether either Chief Best or Officer Fisher indicated that your policy should be altered or clarified in any way?

A. I don't specifically, no.

Q. And you also indicate down below that, "Depending" -- you were going to talk with representatives from the City's department involved in barricade removal, and that, "Depending on how that operation went, I may be able to adjust the current response protocol to the area."

Do you recall whether the -- you adjusted the current response protocol to the area after barricade removal?

A. It wasn't adjusted because the barricades -- if this is still June 12th, my recollection, the barricades -- or June 16th, excuse me, the barricades were not removed. So protocols were not adjusted.

Q. So the protocols were not adjusted until all

10 (Pages 37 to 40)

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1 the barricades were removed on the morning of July 1,
 2 2020; is that right?

3 MR. CRAMER: Objection. Form.

4 A. To the best of my recollection, that's correct.

5 MR. WEAVER: We've been going an hour. I
 6 don't know if you want to take a break or -- Shane,
 7 or --

8 MR. CRAMER: Yeah, that works.

9 MR. WEAVER: Okay.

10 MR. CRAMER: Come back in ten?

11 THE VIDEOGRAPHER: Going off the record at
 12 10:01.

13 (Recess from 10:01 a.m. to 10:11 a.m.)

14 THE VIDEOGRAPHER: We are back on the record
 15 at 10:11.

16 E X A M I N A T I O N (Continuing)

17 BY MR. WEAVER:

18 Q. So do you recall an incident involving a
 19 business called Car Tender on, I believe it was,
 20 June 14, 2020?

21 A. I don't.

22 MR. WEAVER: I'm going to pull something up
 23 here, in case you're wondering.

24 THE WITNESS: Okay.

25 (Exhibit No. 6 marked.)

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1 Q. Okay. If you could go down to the bottom of
 2 Lieutenant Davis's email. There's a section called "Car
 3 Tender Incidents."

4 A. Yes, I see it.

5 Q. Okay. Specifically, I'd like you to look at
 6 the third paragraph under there called "Note," and then
 7 it says, "Car Tender is the same location." If you
 8 could just take a minute to read that.

9 A. Okay. I've read it.

10 Q. Does that ring any bells for you, as far as Car
 11 Tender?

12 MR. CRAMER: Objection. Form.

13 BY MR. WEAVER:

14 Q. And the incident on June 14, 2020?

15 MR. CRAMER: Same objection.

16 A. I'm reading everything through here, and there
 17 was so much happening during that time, I don't recall
 18 this specific.

19 BY MR. WEAVER:

20 Q. Okay. So I just want to ask you, so Car Tender
 21 was at a location at -- it's indicated here, 1706 12th
 22 Avenue.

23 A. Yes, that's what it says.

24 Q. Do you recall whether that was inside or
 25 outside the red zone?

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1 BY MR. WEAVER:

2 Q. Exhibit 6 should be there, or coming shortly.

3 A. Okay. I have it.

4 Q. So do you recognize this document?

5 A. Yes. It's an email, but it's -- it looks like
 6 it's an overnight situation report that was sent to me
 7 on June 16th.

8 Q. And who's Tyrone Davis?

9 A. He at the time sergeant, now he's lieutenant,
 10 but he's still with the Seattle Police Department. He
 11 was working overnights in the police operations center,
 12 which we were running 24/7 at this time.

13 Q. Okay. And the point was to give you an update
 14 of what had happened over the previous 12 hours? Was
 15 that -- or whatever the previous shift was? Is that --

16 A. It was overnights, so it may run 11:00 to
 17 midnight through the -- through the next morning.

18 Q. What shifts were you working during this period
 19 of June -- you know, during the time of June 2020?

20 A. It might be easier to say when I wasn't
 21 working. I was -- I didn't really have a shift. I
 22 mean, I generally start fairly early in the morning.
 23 Depending on what was going on, I'd be there until late
 24 at night, 11:00, 12:00, sometimes 1:00 a.m., just
 25 depending on what was happening.

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1 Q. Okay. If you could go down to the bottom of
 2 Lieutenant Davis's email. There's a section called "Car
 3 Tender Incidents."

4 A. Yes, I see it.

5 Q. Okay. Specifically, I'd like you to look at
 6 the third paragraph under there called "Note," and then
 7 it says, "Car Tender is the same location." If you
 8 could just take a minute to read that.

9 A. Okay. I've read it.

10 Q. Does that ring any bells for you, as far as Car
 11 Tender?

12 MR. CRAMER: Objection. Form.

13 BY MR. WEAVER:

14 Q. And the incident on June 14, 2020?

15 MR. CRAMER: Same objection.

16 A. I'm reading everything through here, and there
 17 was so much happening during that time, I don't recall
 18 this specific.

19 BY MR. WEAVER:

20 Q. Okay. So I just want to ask you, so Car Tender
 21 was at a location at -- it's indicated here, 1706 12th
 22 Avenue.

23 A. Yes, that's what it says.

24 Q. Do you recall whether that was inside or
 25 outside the red zone?

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1 A. If you don't mind, I'll just look at a map
 2 again.

3 Q. Sure.

4 A. Let me get the blocks down. If I remember my
 5 addresses correctly, it would be just -- 1700 block of
 6 12th would be just north of Olive Street, I believe, so
 7 it would be on the border --

8 Q. You're correct.

9 A. It would be right -- right on the border of the
 10 red zone.

11 Q. On the -- on the outside of that border; is
 12 that correct?

13 A. It looks like maybe one block --

14 MR. CRAMER: Objection. Form.

15 A. It's the block -- it's a block just north of
 16 the northern boundary on East Olive Street and 12th
 17 Avenue, is the 1700 block.

18 BY MR. WEAVER:

19 Q. So I want you to go back to the paragraph we
 20 were looking at on Exhibit 6, and Lieutenant Davis says,
 21 "Patrol did not respond due to its proximity to the red
 22 zone," and then it lists a -- I think it's a cause
 23 number, "coupled with an ongoing disturbance at the
 24 location that include armed participants."

25 Do you see that?

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1 A. I do.

2 Q. If Lieutenant Davis was correct in his
3 description, would that have been consistent with the
4 directives you gave about the red zone and the Edward
5 Sector and police responses?

6 MR. CRAMER: Objection. Form. Foundation,
7 calls for speculation.

8 A. I would need to know more of the context of the
9 incident. We'd given direction to our folks of how we
10 wanted them to respond. Ultimately, they have
11 discretion in the field about how they're going to
12 approach an incident based on the directive and the
13 parameters that we had given them.

14 But the idea was, is that's why we would get
15 these situation reports, knowing that we would have
16 incidents that would come up, that we couldn't plan for
17 every contingency, and if things came up, how are we
18 going to adjust our responses, moving forward, if --
19 if -- if that was necessary.

20 MR. WEAVER: Okay. I'm going to drop
21 Exhibit 7 into the chat.

22 (Exhibit No. 7 marked.)

23 THE WITNESS: Okay.

24 BY MR. WEAVER:

25 Q. And if you can just take a moment to read

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1 teams each night that would be able to respond to those
2 events that are laid out in the directive.

3 And again, this was a very dynamic event and we
4 were every day reviewing. That's why these reports --
5 situation reports were put out every night. We reviewed
6 them every morning to help us better determine and
7 coordinate our response to the event, based on -- or the
8 area of the red zone, based on what we were seeing.

9 Again, we were building this airplane while we
10 were flying it, essentially, and we were really
11 committed to, again, trying to avoid force,
12 confrontation, keep the public and our officers safe.

13 BY MR. WEAVER:

14 Q. Within the meaning of the directives that were
15 in the IAP and your -- and what was sent out
16 department-wide on June 12th, would the events as
17 described here in Exhibit 7 be a mass casualty event?

18 MR. CRAMER: Objection. Form.

19 A. Again, as I think I said before, that wording
20 was unfortunate, and we went to change it. And it
21 was -- examples were provided of what an event was, but
22 again, the officers, the supervisor, the commander on
23 the ground have to make those in-the-moment, on-the-spot
24 tactical decisions about how they're going to respond to
25 particular events.

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1 through Page 2 of this document, Bates No. 156959.

2 A. Okay. I've read it.

3 Q. All right. Does that -- does that refresh any
4 recollection you might have about what was alleged to
5 have happened at Car Tender on June 14, 2020?

6 A. It doesn't. I mean, like I say, a lot happened
7 during that time. There were a lot of incidents or
8 events, and this lays out very clearly what occurred,
9 though, in the statement of probable cause.

10 Q. Okay. So if the facts in this statement of
11 probable cause are accurate and the police did not
12 respond to this reported situation, would that have been
13 consistent with the directive that you had given the
14 police department on how to respond to incidents within
15 the Edward Sector?

16 MR. CRAMER: Objection. Form and
17 foundation, calls for speculation.

18 A. Again, the officers have to have latitude and
19 discretion based on directives I gave them. I'm reading
20 this. It says it's just outside the periphery of the
21 zone. And there are some concerning elements of this
22 regarding some of the actions of the crowd taken.

23 But I know at some point during this, either
24 before or after this event -- I don't recall the
25 specifics -- that we set up and we designated specific

1 BY MR. WEAVER:

2 Q. Okay. Would this be within the meaning of the
3 June 29th IAP, a critical life safety emergency?

4 MR. CRAMER: Objection. Form. Asked and
5 answered.

6 A. There's certainly details in here that, if the
7 officers had known at the time, I would have wanted them
8 to have considered about, are there life safety or other
9 elements there that they need to respond to and address,
10 whether it's with the resources they have there or
11 calling in more resources to address it. I just don't
12 know if they had all of these facts available to them at
13 the time.

14 BY MR. WEAVER:

15 Q. What particular details?

16 A. Let me read through this again quickly.

17 MR. CRAMER: And objection. Form.
18 Foundation, calls for speculation.

19 A. They claim there was a fire lit inside the
20 building, so that would be information I think it would
21 be important for them potentially to have, and make an
22 assessment of what the safety ramifications were to
23 that.

24 Let me just read through some more of the
25 details so I just state them correctly. It says here

12 (Pages 45 to 48)

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1 adjourned at 3:40.
2 (Deposition concluded at 3:40 p.m.)
3 (Reading and signing was requested
4 pursuant to FRCP Rule 30(e).)
5 -00-

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1 C E R T I F I C A T E

2
3 STATE OF WASHINGTON
4 COUNTY OF PIERCE5
6 I, Cindy M. Koch, a Certified Court Reporter in
7 and for the State of Washington, do hereby certify that
8 the foregoing transcript of the deposition of Thomas
9 Mahaffey, having been duly sworn, on January 26, 2022,
10 is true and accurate to the best of my knowledge, skill
11 and ability.12 IN WITNESS WHEREOF, I have hereunto set my hand
13 and seal this 2nd day of February, 2022.14
15
16 CINDY M. KOCH, CCR, RPR, CRR17
18 My commission expires:
19 JUNE 9, 202220
21
22
23
24
25

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